

Civil Action No. 7:08-CV-00130-FL

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Zometa®;

7. Testimony or evidence that some or many of the articles concerning bisphosphonates in medical journals were actually “ghostwritten” by drug companies, including NPC;

8. Evidence concerning foreign regulatory actions or materials such as package inserts for Zometa® distributed in foreign countries;

9. Discovery disputes;

10. Characterizations of counsel for NPC in a manner that could prejudice NPC;

11. References to drug companies having an “incestuous” relationship with FDA;

12. References to Dr. Suzanne Parisian as the “Former Chief Medical Officer” of FDA;

13. References to dental pain jurors may have experienced and the treatment they received;

14. Evidence regarding “moral obligations” and “legal conclusions” by Plaintiffs’ experts;

15. Evidence or argument regarding regulatory enforcement or interactions between FDA and NPC concerning drugs other than Aredia® or Zometa®;

16. References to testimony by Plaintiffs’ expert, Dr. Robert E. Marx, regarding his compensation; and

17. References to NPC’s corporate structure or to the fact that NPC is based in Switzerland.

The grounds for this motion are set forth in detail in the accompanying memorandum of law.

Dated: December 2, 2011

Respectfully submitted,

/s/ Peter G. Pappas

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing NOVARTIS PHARMACEUTICALS CORPORATION'S OMNIBUS MOTION IN LIMINE, using the CM/ECF system, which will send notification of such filing to CM/ECF participants:

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This the 2nd day of December, 2011.

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